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Hearing Date: May 18, 2022
Response Date: April 4, 2022
Reply Date: May 4, 2022

Attorneys for Defendant Multi-Strategy Fund Limited

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

MULTI-STRATEGY FUND LIMITED,

Defendant.

No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01205 (CGM)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon Defendant Multi-Strategy Fund Limited's Memorandum of Law in Support of Its Motion to Dismiss the Amended Complaint, the accompanying Declarations of Robert J. Lack, dated March 4, 2022, and Mario A. Therrien, dated January 28, 2022, and the exhibits thereto, the Amended Complaint, dated February 18, 2022, in the above-captioned adversary proceeding, and all prior pleadings and proceedings herein, defendant Multi-Strategy Fund Limited ("Multi-Strategy") will move this Court on May 18, 2022 at 10 a.m. for an order dismissing the Amended Complaint filed by plaintiff Irving H. Picard, Trustee (the "Trustee") for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order in this proceeding entered December 28, 2021, the Trustee shall respond to this motion by April 4, 2022 and Multi-Strategy shall file its reply by May 4, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Multi-Strategy does not consent to the entry of final orders or judgment by this Court.

Dated: New York, New York
March 4, 2022

s/ Robert J. Lack
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